

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FORT SMITH DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FILED
JUN 29 2017
By DOUGLAS F. YOUNG, Clerk
Deputy Clerk

ALECHIA REEVES

PLAINTIFF

vs.

NO. 17-2109

TRI-HILL TURF CARE, INCORPORATED AND
TRI-HILL PEST CONTROL, INCORPORATED

DEFENDANTS

NOTICE OF REMOVAL

1. You are notified that the case of *Alechia Reeves v. Tri-Hill Care, Inc and Tri-Hill Pest Control, Inc.*, formerly pending in the Circuit Court of Sebastian County, Arkansas as No. 66CV-17-0566 is hereby removed to the United States District Court for the Western District of Arkansas, Fort Smith Division. These papers are being served on you as attorney for the plaintiff.

2. You are notified that this Notice of Removal is filed on June 29, 2017 in the United States District Court, Western District of Arkansas, Fort Smith Division, all as provided by law.

3. Defendants shall give notice of this notice of removal to the clerk of the Circuit Court of Sebastian County, Arkansas in accordance with 28 U.S.C. § 1446(d).

4. This Notice of Removal is filed within thirty (30) days (or the first filing day thereafter), of the first delivery of a summons and copy of the complaint to defendant Daniel Hill, agent for service for Tri-Hill Turf Care, Incorporated and Tri-Hill Pest Control, Incorporated. Copies of the summons and the complaint are attached hereto as Exhibit 1, these constituting all the process and pleadings that have been delivered to defendants.

5. This action is removable pursuant to the provisions of 28 U.S.C. § 1441(a) in that this is a civil action brought pursuant to the Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000(e), et seq., in which jurisdiction is proper in this Court under 28 U.S.C. § 1331.

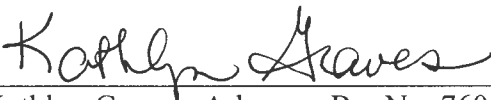
6. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 and 42 U.S.C. § 2000(e)-5.

7. The undersigned states that this removal is well grounded in fact and is warranted by existing law, and is not interposed for improper purpose.

WHEREFORE, Defendants Tri-Hill Turf Care, Incorporated and Tri-Hill Pest Control, Incorporated remove this action from the Circuit Court of Sebastian County, Arkansas to the United States District Court for the Western District of Arkansas, Fort Smith Division, and seek resolution by this Court of all issues raised herein.

Respectfully submitted,


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By: 
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Attorney for Defendants,
Tri-Hill Turf Care, Incorporated and Tri-Hill
Pest Control, Incorporated

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2017 I sent the foregoing pleading via U.S. Mail to the following

Joe D. Byars, P.A.
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